

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*  
FRANK PRUCHNIK \*  
\*  
Plaintiff \* CIVIL ACTION NO.  
\* 04-10868 NMG  
\*  
vs. \*  
\*  
ROBERT BUERKLE GmbH & CO. \*  
\*  
Defendant \*  
\* \* \* \* \*

**JOINT MOTION TO AMEND SCHEDULING ORDER**

The parties jointly move to further amend the order to allow for additional time to complete fact and expert discovery in this case. As grounds for the request, the parties state that fact discovery has taken longer than expected in part because it took longer than anticipated for the Defendant, located in Europe, to respond to the Plaintiff's interrogatories and document requests. The parties are in the process of completing the remaining fact depositions, identifying experts and otherwise preparing the case for trial. The Plaintiff and one fact witness have been deposed and depositions of other fact witnesses are scheduled.

The parties therefore request that the Court allow their joint request to amend the original scheduling order deadlines by sixty (60) days. The parties proposed amended schedule is as follows:

September 12, 2007: Completion of all discovery, other than requests for expert disclosures.

October 10, 2007: Plaintiff's service of all expert disclosures, if any, pursuant to Fed.R.Civ.P. 26(a)(2).

November 12, 2007: Defendant's service of all expert disclosures, if any, pursuant to Fed.R.Civ.P. 26(a)(2).

January 7, 2008: Deadline to complete expert depositions.

January 7, 2008: File any dispositive motions under Fed.R.Civ.P. 56, with all supporting documents.

The parties respectfully request that the Court allow their motion to amend the schedule as outlined.

RESPECTFULLY SUBMITTED,

By Plaintiff's Attorney:

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